

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

Andrew T. Archer, Esq.
Brenner, Spiller & Archer
175 Richey Avenue
W. Collingswood, NJ 08107
(856) 963-5000
Attorney for Debtor(s)
ATA 005272008

In Re:

Karl Kramer
Dawn Kramer,
Debtors.

Case No.: 17-19125

Judge: JNP

Chapter: 13

CHAPTER 13 DEBTOR'S CERTIFICATION IN OPPOSITION

The debtor in this case opposes the following (**choose one**):

1. Motion for Relief from the Automatic Stay filed by _____, creditor,

A hearing has been scheduled for _____, at _____.

Motion to Dismiss filed by the Chapter 13 Trustee.

A hearing has been scheduled for _____, at _____.

Certification of Default filed by GSAA Home Equity Trust,

I am requesting a hearing be scheduled on this matter.

2. I oppose the above matter for the following reasons (**choose one**):

Payments have been made in the amount of \$ _____, but have not been accounted for. Documentation in support is attached.

Payments have not been made for the following reasons and debtor proposes repayment as follows (**explain your answer**):
See attached letter of explanation.

Other (**explain your answer**):

3. This certification is being made in an effort to resolve the issues raised in the certification of default or motion.
4. I certify under penalty of perjury that the above is true.

Date: 7/6/2018

/s/ Karl Kramer
Debtor's Signature

Date: 7/6/2018

/s/ Dawn Kramer
Debtor's Signature

NOTES:

1. Under D.N.J. LBR 4001-1(b)(1), this form must be filed with the court and served on the Chapter 13 Trustee and creditor, if applicable not later than 7 days before the date of the hearing if filed in opposition to a Motion for Relief from the Automatic Stay or Chapter 13 Trustee's Motion to Dismiss.
2. Under D.N.J. 4001-1 (b)(2), this form must be filed with the court and served on the Chapter 13 Trustee and creditor, if applicable not later than 14 days after the filing of a Certification of Default.

Explanation-Objection-070518

SLS - Kramer Objection to the Certification

Judge Jerrold N. Poslusny, Jr. and all parties involved,

Summary: 3 of 6 agreed payments have already been made - 4th payment will be made from pay received on Friday 7/6/18.

Explanation/Cause: I made a change of jobs due to forecasted layoffs which unfortunately comes with higher medical insurance premiums, increased escrow amount for SLS mortgage increasing my monthly payment immediately following the time the arrears agreement was made, unexpected ER trip with my 3 year old daughter diagnosed as Febrile Seizure.

I also have been maintaining my agreed \$275 per week child support with direct payment to my ex-wife outside of the Chapter 13 program.

We have been maintaining my commitments to the Chapter 13 trustee as well as a secondary mortgage company (with lien) agreement that agreed to receive \$200 per month for 40 months or until \$8,000 debt is settled.

Reason for SLS believing I'm in default originally started with the fact that they haven't acknowledged (in their systems) the two months of mortgage payments that were included in the Chapter 13 program, making it appear that I'm more than 1 month behind. The previous objection is what outlined the fact that I was one month behind. I'm making the best efforts I can with the money at hand to settle the arrears and I have no desire to default or lose my home.

Thank you for your time and considerations,

Below are my best intentions at this time to resolve the debt and start to get back on track with making payments on / near the 1st of each month.
If SLS would consider allowing the final two arrears payments to be extended over the next few pay checks or months, I should be able to get back on track with the primary mortgage.

7/6/18 - Already scheduled this payment

7/20/18 - pending 5th payment including additional as agreed

8/17/18 - pending 6th payment including additional as agreed

Sincerely,

Date: 07/05/18

Karl J. Kramer, Jr.